

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

In re:

STEVEN C. HORN

Bankruptcy No:
15-10609-RGM

Debtor(s),

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

COMES NOW U.S. Bank National Association, as Trustee for Stanwich Mortgage Loan Trust Series 2011-4, a secured creditor in the above referenced Chapter 13 matter, by counsel, and for its Objection to the Confirmation of the Debtor's Chapter 13 Plan respectfully states the following:

1. That the Debtor is indebted to the Movant in the approximate principal amount of \$523,187.10 which is secured by a Deed of Trust on certain real estate owned by the Debtor at 1676 George Knoll Court, Woodbridge, VA.
2. That provision 5(A) of Debtor's Chapter 13 Plan inaccurately states the pre-petition arrearage owed to the Movant totals \$61,229.98. The actual pre-petition arrearage owed to Movant for this lien is \$84,572.85. Movant, timely filed a proof of claim in the amount of \$590,584.81 containing arrearages of \$84,572.85.
3. That based upon the foregoing, the Debtor's plan is not feasible and that it fails to cure the pre-petition arrearage due to Movant.

Jon M. Ahern, Esquire
State Bar Association No: 018218
Sykes, Bourdon, Ahern & Levy, P.C.
281 Independence Boulevard
Pembroke 1 Building, Fifth Floor
Virginia Beach, VA 23462
757-499-8971

WHEREFORE, U.S. Bank National Association, as Trustee for Stanwich Mortgage Loan Trust Series 2011-4, prays for the entry of an Order denying confirmation of the Debtor's proposed plan, and for such further and other relief as in the premises may seem just.

U.S. BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR
STANWICH MORTGAGE LOAN TRUST SERIES 2011-4

/s/ Jon M. Ahern
Jon M. Ahern
Attorney for Movant

NOTICE OF HEARING ON OBJECTION TO CONFIRMATION

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one).

If you do not want the Court to deny confirmation of your Plan or if you want the Court to consider your views on the Objection, then you and your attorney must:

ATTEND THE HEARING SCHEDULED TO BE HELD:

At the United States Bankruptcy Court on May 13, 2015 at 9:30 AM.

**US Courthouse
Judge Mayer's Courtroom, Courtroom 1
200 South Washington St., 2nd Floor
Alexandria, VA**

to consider and act upon the Objection to Confirmation of the Original Plan filed by U.S. Bank National Association, as Trustee for Sanwich Mortgage Loan Trust Series 2011-4.

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the Objection and may enter an order granting that relief.

/s/ Jon M. Ahern
Jon M. Ahern
Attorney for Movant

Certificate of Mailing

I hereby certify that the foregoing Objection to Confirmation and Notice of Objection to Confirmation was forwarded electronically and/or mailed via U.S. Mail on this 1st day of May, 2015 to:

/s/ Jon M. Ahern
Jon M. Ahern

Steven C. Horn
1676 George Knoll Court
Woodbridge, VA 22192

Tommy Andrews, Jr.
122 North Alfred Street
Alexandria, VA 22314

Thomas P. Gorman
300 N. Washington St., Ste. 400
Alexandria, VA 22314